

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
CROWN CLOTHING CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 05-10049(NG)
)	
RANDCORE, INC.,)	
RAND INTERNATIONAL TRADING,)	
INC., ANDRE BERNARD, AND)	
RONALD BERNARD,)	
)	
Defendants.)	
_____)	

REVISED JOINT STATEMENT AND PRETRIAL SCHEDULE

In accordance with the Court's order, dated May 17, 2006, and pursuant to Local Rule 16.1, counsel for plaintiff Crown Clothing Corporation ("Crown Clothing") and defendant Ronald Bernard have conferred and agree upon the following proposed pretrial schedule:

A. Proposed Discovery Plan, Schedule for Dispositive Motions, and Trial

1. Initial Disclosures. Ronald Bernard shall serve and file his Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) no later than June 16, 2006.
2. Production of Documents by Ronald Bernard. Ronald Bernard shall serve his responses and objections to the First Request of the Plaintiff Crown Clothing Corporation for Production of Documents by Each Defendant, dated December 7, 2004 (the "Request"), no later than June 16, 2006. Should any documents within the possession, custody and/or control of Ronald Bernard be responsive to the Request, he shall thereafter promptly begin the production of Bates numbered copies of the documents requested in the Request and the documents required to be identified or produced by Federal Rules of Civil Procedure 26(a)(1)(B) and (C). Ronald Bernard shall complete his production of documents no later than July 14, 2006.

3. Production of Documents By Crown Clothing. Ronald Bernard will serve any initial requests for the production of documents on Crown Clothing no later than June 23, 2006. Crown Clothing will serve its responses and objections to any such requests no later than July 24, 2006. Should any documents within the possession, custody and/or control of Crown Clothing be responsive to such requests, Crown Clothing shall thereafter promptly begin the production of Bates numbered copies of the documents requested in such requests and the documents required to be identified or produced by Federal Rules of Civil Procedure 26(a)(1)(B) and (C). Crown Clothing will complete its production of documents no later than August 18, 2006.

4. Close of Fact Discovery. All fact discovery shall be completed by October 1, 2006.

5. Experts.

a. Crown Clothing shall serve the reports of its expert witnesses on or before October 16, 2006.

b. Ronald Bernard shall serve the reports of his expert witnesses on or before November 17, 2006.

c. Crown Clothing shall serve any rebuttal expert reports by December 18, 2006.

d. All expert discovery shall be completed by January 19, 2007.

6. Dispositive Motions.

a. All motions pursuant to Federal Rule of Civil Procedure 56 shall be served and filed on or before February 16, 2007.

b. All oppositions to motions pursuant to Federal Rule of Civil Procedure 56 shall be served and filed on or before March 16, 2007.

c. All replies in support of motions pursuant to Federal Rule of Civil

Procedure 56 shall be served and filed on or before April 6, 2007.

d. Hearing on motions pursuant to Federal Rule of Civil Procedure 56 shall

be scheduled for May 2007, or at the discretion of the Court.

7. Trial. Trial of this matter shall be scheduled for July 2007, or at the discretion of the Court.

/s/ Ryan M. MacDonald
John C. Wyman (BBO #535620)
Ryan M. MacDonald (BBO #654688)
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, MA 02110
(617) 457-4000
jewyman@murthlaw.com
rmacdonald@murthalaw.com

*Attorneys for Plaintiff Crown
Clothing Corporation*

Dated: May 24, 2006

/s/ Gary R. Greenberg
Gary R. Greenberg (BBO #209420)
Annapoorni R. Sankaran (BBO #631065)
James M. Vant (BBO #653616)
Greenberg Traurig
One International Place
Boston, MA 02110
(617) 310-6000
greenbergg@gtlaw.com
sankarana@gtlaw.com
vantj@gtlaw.com

Attorney for Defendant Ronald Bernard